

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**PRESTWICK LICENSING LLC,**

Plaintiff,

v.

**NOFFZ TECHNOLOGIES U.S.A., INC.,**

Defendant.

C.A. No. 6:22-cv-815

**JURY TRIAL DEMANDED**

**PATENT CASE**

**ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Prestwick Licensing LLC files this Original Complaint for Patent Infringement against Noffz Technologies U.S.A, Inc., and would respectfully show the Court as follows:

**I. THE PARTIES**

1. Plaintiff Prestwick Licensing LLC (“Prestwick” or “Plaintiff”) is a Texas limited liability company having an address at 5121 Collin McKinney Pkwy, Ste 500, McKinney, TX 75070-1524.

2. On information and belief, Defendant Noffz Technologies U.S.A, Inc. (“Defendant”) has a place of business at 2808 Longhorn Blvd, Suite 308 Austin, TX 78758. Defendant has a registered agent at Capitol Corporate Services Inc., 1501 S Mopac Expy, STE 220, Austin, TX 78746.

**II. JURISDICTION AND VENUE**

3. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction of such action under 28 U.S.C. §§ 1331 and 1338(a).

4. On information and belief, Defendant is subject to this Court’s specific and general personal jurisdiction, pursuant to due process and the Texas Long-Arm Statute, due at least to its

business in this forum, including at least a portion of the infringements alleged herein, at 2808 Longhorn Blvd, Suite 308 Austin, TX 78758.

5. Without limitation, on information and belief, within this state, Defendant has used the patented inventions thereby committing, and continuing to commit, acts of patent infringement alleged herein. In addition, on information and belief, Defendant has derived revenues from its infringing acts occurring within Texas. Further, on information and belief, Defendant is subject to the Court's general jurisdiction, including from regularly doing or soliciting business, engaging in other persistent courses of conduct, and deriving substantial revenue from goods and services provided to persons or entities in Texas. Further, on information and belief, Defendant is subject to the Court's personal jurisdiction at least due to its sale of products and/or services within Texas. Defendant has committed such purposeful acts and/or transactions in Texas such that it reasonably should know and expect that it could be haled into this Court as a consequence of such activity.

6. Venue is proper in this district under 28 U.S.C. § 1400(b). On information and belief, Defendant has businesses in this district at 2808 Longhorn Blvd, Suite 308 Austin, TX 78758. On information and belief, from and within this District Defendant has committed at least a portion of the infringements at issue in this case.

7. For these reasons, personal jurisdiction exists, and venue is proper in this Court under 28 U.S.C. § 1400(b).

**III. COUNT I**  
**(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 7,668,301)**

8. Plaintiff incorporates the above paragraphs herein by reference.

9. On February 23, 2010, United States Patent No. 7,668,301 ("the '301 Patent") was duly and legally issued by the United States Patent and Trademark Office. The '301 Patent is titled "Simulated User Calling Test System and Method with Built-In Digital SPC-Exchange." A true

and correct copy of the '301 Patent is attached hereto as Exhibit A and incorporated herein by reference.

10. Prestwick is the assignee of all right, title, and interest in the '301 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the '301 Patent. Accordingly, Prestwick possesses the exclusive right and standing to prosecute the present action for infringement of the '301 Patent by Defendant.

11. The invention in the '301 Patent relates to the field of digital stored program control (SPC) switch technique in telecommunications, particularly, to a simulated user call test system built-in digital SPC switch and method. (Ex. A at 1:13-16).

12. In the prior art, simulated user calling performance tests for digital SPC switches mainly employed large traffic call test instruments. (*Id.* at 1:20-22). The available commercial simulated user calling test instruments simulated the calling process of actual users realistically, in which the test is performed by transmitting and receiving pass detecting tone and judging the pass detecting tone while a call is initiated on a user line, a dial is simulated, and the call is communicated. (*Id.* at 1:23-28). However, these systems were expensive and therefore many network operators do not buy this type of equipment and therefore calling tests are very complicated during pass tests of many digital SPC switches. (*Id.* at 1:31-37). It is therefore advantageous and simpler if a calling test instrument was built into the switch. (*Id.* at 1:35-37).

13. There are existing switches with a built-in large traffic calling test system characterized by designing a virtual calling process on a user element processor, simulating the whole process including initiating a call by a user and answering the call by the called user. (Ex. A at 1:43-48). However, the main disadvantage of these kind of system was that it could only realistically test the process of call signaling by the main control system in a test switch, but not

the performance such as the hardware interface performance in the switch and the performance of the switching connection path. (*Id.* at 1:48-53). Furthermore, they cannot accurately reflect the call process performance of the switch system. (*Id.* at 1:53-54).

14. The technical problem solved by the inventors is to provide a simulated user call test system located within a digital SPC switch, and to provide a test method based on built-in modules of a digital SPC switch, in which equal functions to commercial external call test systems can be realized with a lower cost by user the current hardware and software resources in a digital SPC switch. (*Id.* at 1:58-64).

15. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing claim 1 of the ‘301 Patent in Texas, and elsewhere in the United States, by making, using, selling, and or offering to sell the Noffz Base Station Emulator sUTP 5018 (“Accused Instrumentality”).

16. A system utilized by the Accused Instrumentality is a simulated user call test system (*e.g.*, GUI-based Application software with the UTP Base Station Emulator), characterized in that the simulated user call test system is built in a digital stored program control switch (*e.g.*, the Accused Instrumentality), and comprises a back process module (*e.g.*, GUI-based Application software), a front call control process module (*e.g.*, user equipment (UE)) and a hardware subsystem (*e.g.*, Hardware Units in the Accused Instrumentality) for performing a call test (*e.g.*, call tests for cellular networks 2G, 3G, 4G and 5G). As shown below, the Accused Instrumentality is a part of the simulated user call test system which is a GUI-based Application software. The Accused Instrumentality comprises back process module (*e.g.*, GUI-based Application software), a front call control process module (*e.g.*, user equipment (UE)) and a hardware subsystem (*e.g.*, Hardware) for performing a call test (*e.g.*, call tests for cellular networks 2G, 3G, 4G and 5G). The

back process module (Application software) provides an operation interface for a user to perform a call test setup (setting various parameters for call test), receives call test result data (*e.g.*, result report) transmitted by the front call control process module (*e.g.*, user equipment (UE)), and displays the result on the display of the Accused Instrumentality. The front call control process module receives call test setup parameters provided by the Application software, controls the hardware subsystem (Hardware Units in the Accused Instrumentality) to perform a call test, and reports a result of the call test to Noffz Application software. The hardware subsystem comprises function process units of the switch to receive instructions from the user equipment (UE), perform tests comprising starting a call, hanging-up a call and handover between calls; and report test results to the front call control process module.



## Base Station Emulator sUTP 5018

FOR CUSTOM CELLULAR NETWORKS



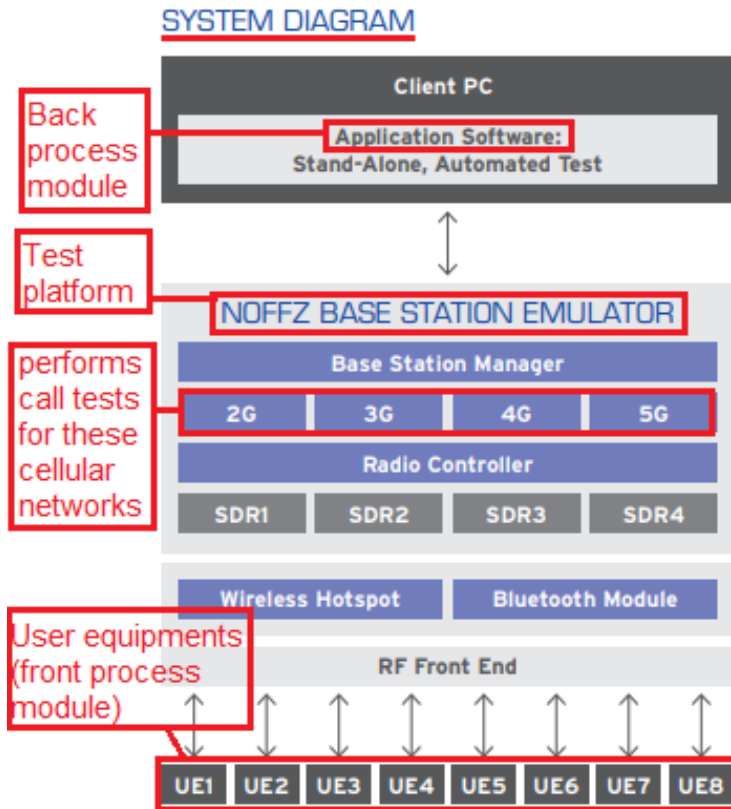
## APPLICATION FIELD

Primarily used for multi-DUT product validation of cellular devices like automotive telematic control units or smartphones. Suitable for comprehensive parallel testing of up to 32 phone modules from simple go/no-go check to 3600 hours life-cycle analysis. Equipped for dual-cell SISO, 2x2 MIMO or single-cell 4x4 MIMO operation to conduct tests like: Voice call, text messaging, eCall, maximum data throughput or mobile hotspot sharing. Reproduce a specific cellular environment, generate traffic, monitor and log connection parameters with the UTP BSE Manager Software.

(E.g., <https://noffz.com/wp-content/uploads/2021/04/14635-produktblatt-sutp-5018-bse.pdf>).

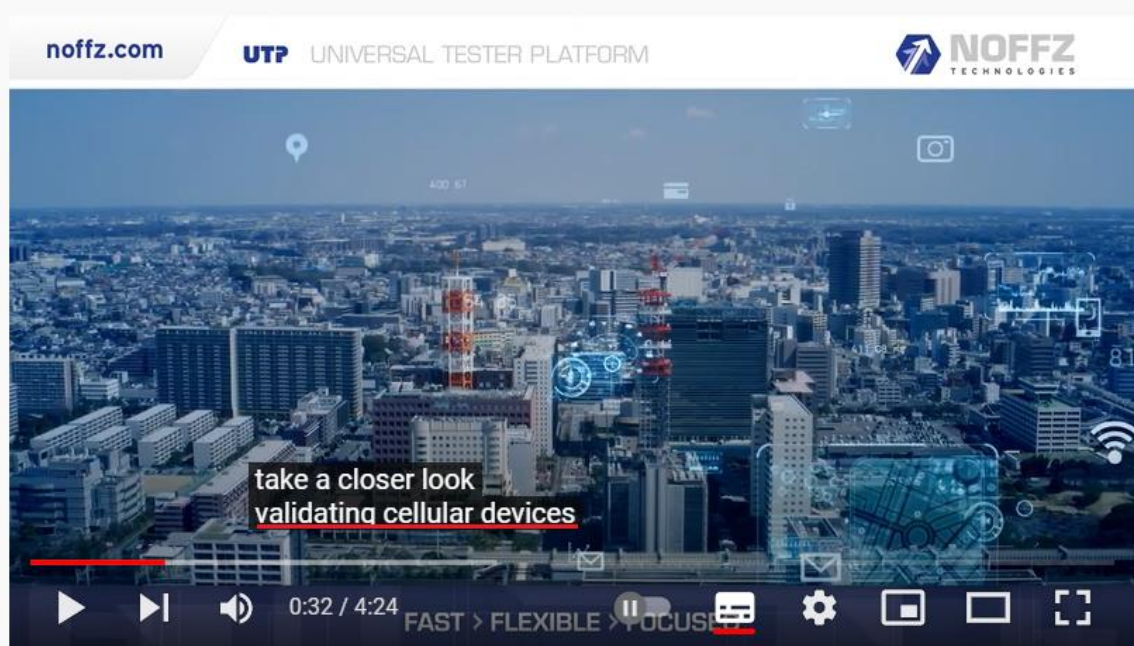
TECHNICAL DATA	
<b>sUTP 5018 BSE</b>	
<b>Mechanics</b>	
Housing	450 x 318 x 495 mm (W x H x D) / 7U
Weight	20 kg
<b>Cellular Networks</b>	
5G NR	NR Rel-15 compliant Non-Standalone support (NSA) Standalone support (SA) 5-100 MHz support FR1 (sub-6GHz) SISO, 2x2 MIMO (NSA and SA) 4x4 MIMO (only SA) Carrier aggregation 3x CC 256-QAM
LTE	LTE Rel-14 compliant SISO dual band 2x2 MIMO dual band 4x4 MIMO single band Carrier aggregation 5x CC VoIP support Handover support
GSM	GSM 850, GSM 900, DCS 1800 and PCS 1900 2x simultaneous ARFCNs Handover support Emergency Call support GPRS/EDGE
UMTS	Band 1, 4, 5, 8, 19 1x UARFCN

(E.g., <https://noffz.com/wp-content/uploads/2021/04/14635-produktblatt-sutp-5018-bse.pdf>).



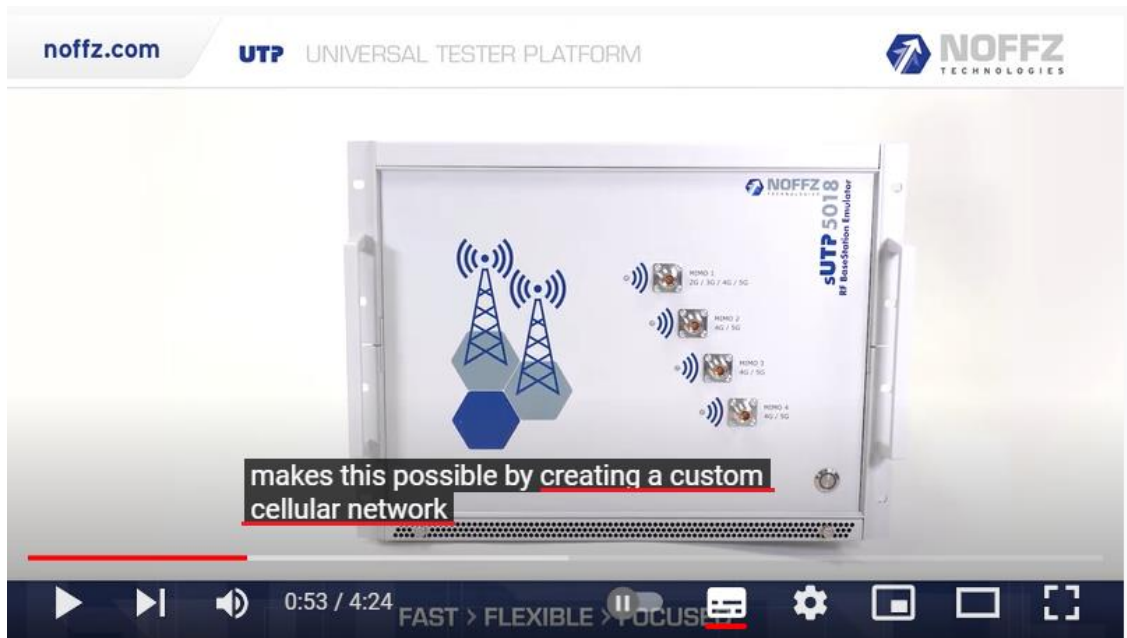
(E.g., <https://noffz.com/wp-content/uploads/2021/04/14635-produktblatt-sutp-5018-bse.pdf> ).





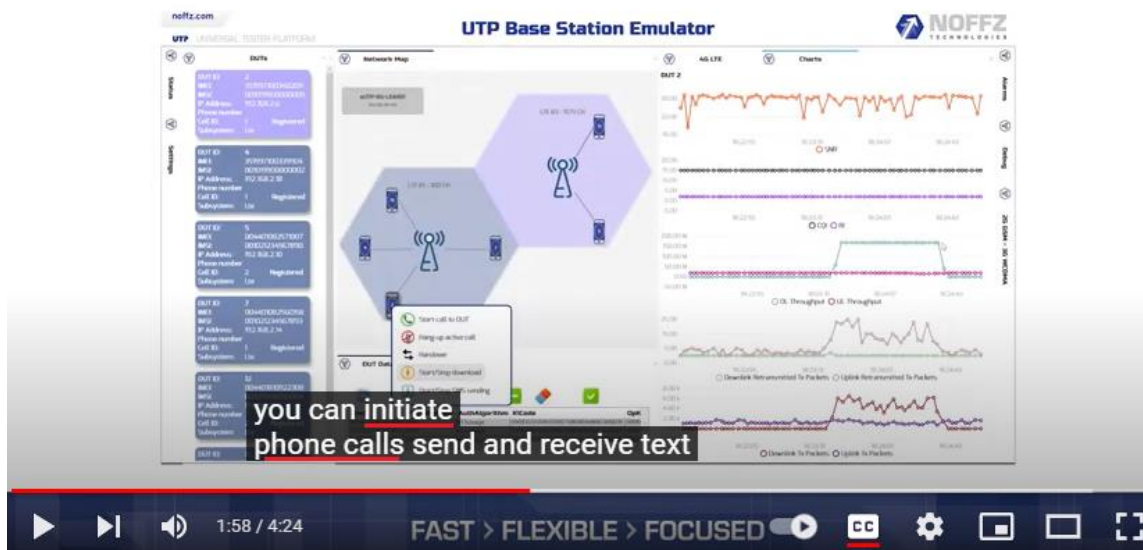
2G to 5G Multi-DUT Functional Test with One Cellular Network Emulator - NOFFZ BSE sUTP 5018

(E.g., <https://www.youtube.com/watch?v=x5Pp1UzADIE>).

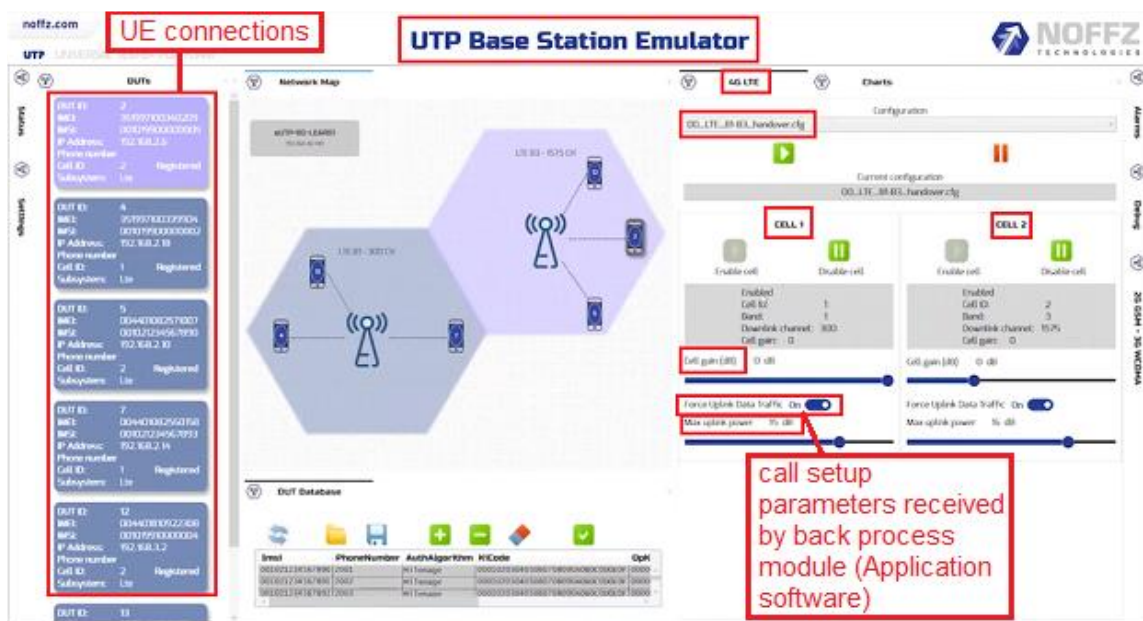


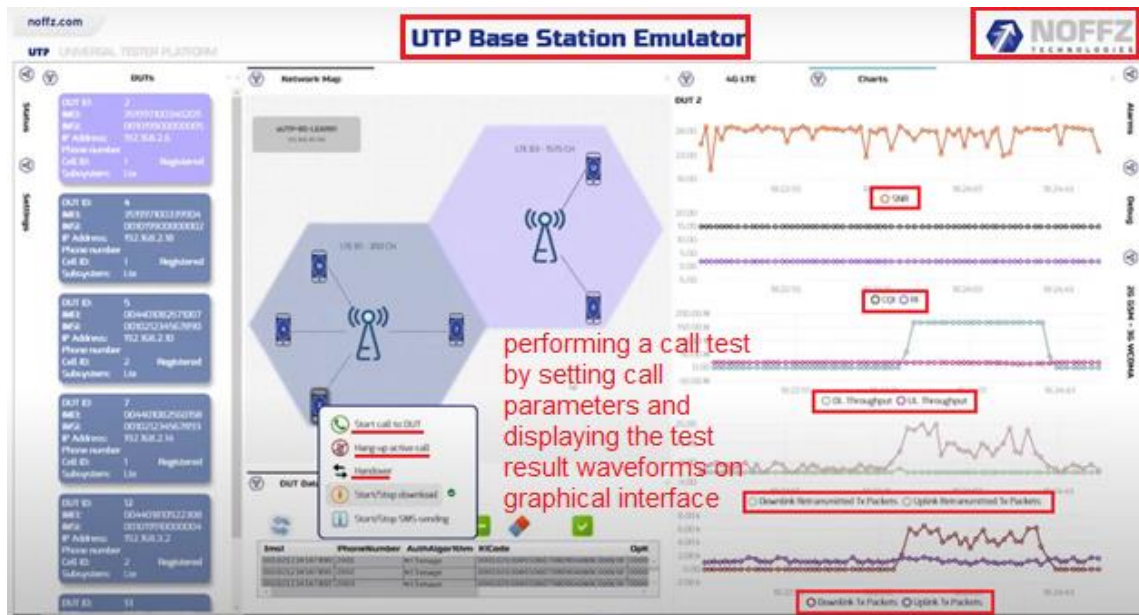
2G to 5G Multi-DUT Functional Test with One Cellular Network Emulator - NOFFZ BSE sUTP 5018





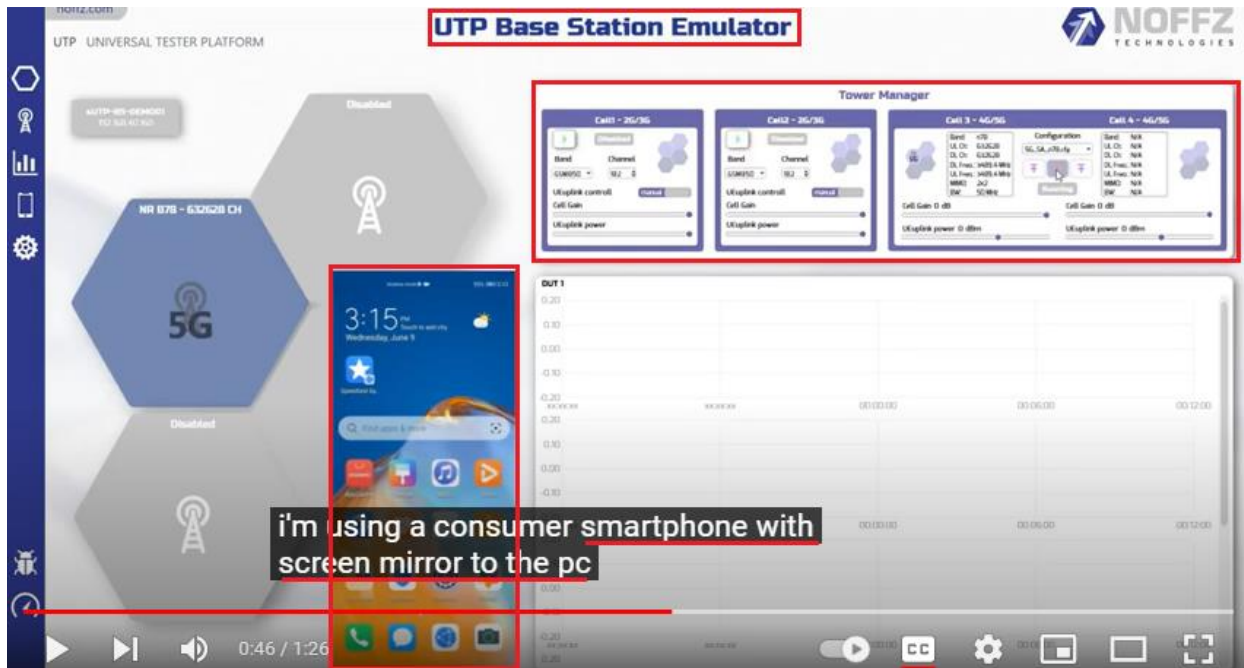
(E.g., <https://www.youtube.com/watch?v=x5Pp1UzADIE>).



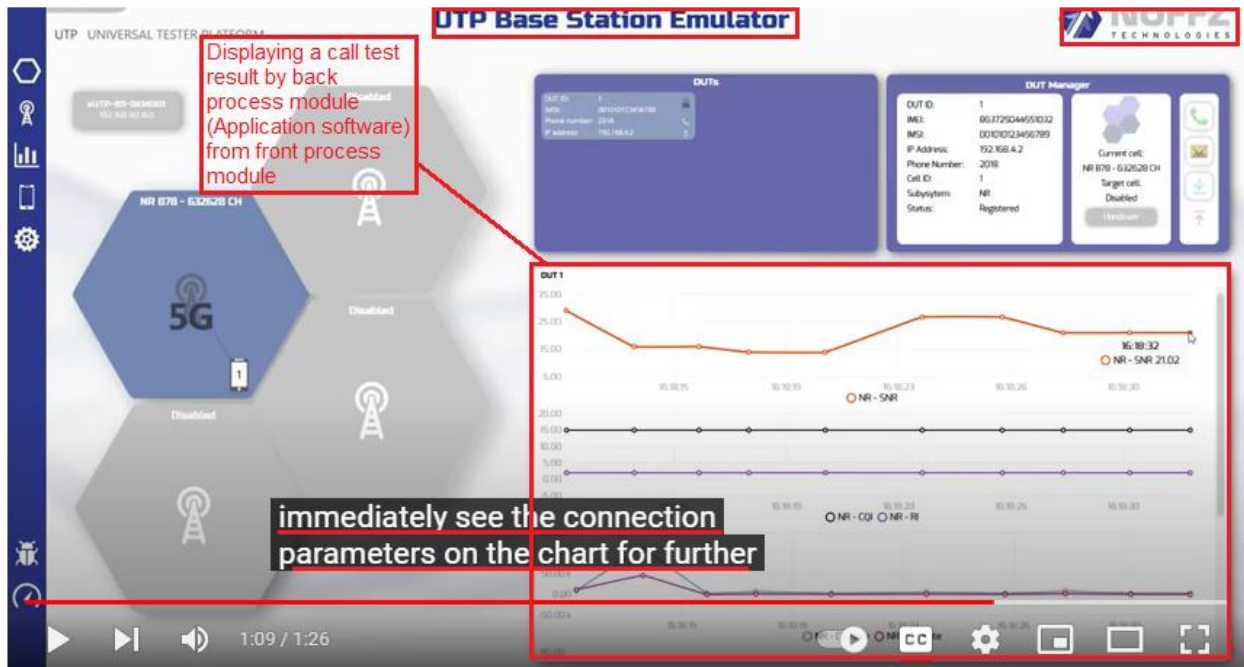


(E.g., <https://www.youtube.com/watch?v=x5Pp1UzADIE>).





(E.g., <https://www.youtube.com/watch?v=x5Pp1UzADIE>).



(E.g., <https://www.youtube.com/watch?v=x5Pp1UzADIE>).

17. The Accused Instrumentality is a simulated user call test system that comprises the back process module (e.g., Noffz Application software) runs on a maintaining platform (e.g., UTP

Base Station Emulator) of the switch (*e.g.*, the Accused Instrumentality) for providing an operation interface (*e.g.*, GUI) for a user to perform a call test setup (*e.g.*, to set various parameters such as SNR, Bandwidth, etc.), receives call test result data (*e.g.*, report of test results waveforms) transmitted by the front call control process module (*e.g.*, user equipment (UE)), and performs display and statistical processes (*e.g.*, display the result and statistical data on the display of the Accused Instrumentality). As shown below, the Accused Instrumentality is a part of the simulated user call test system which is a GUI-based Application software with the UTP Base Station Emulator. The Accused Instrumentality comprises back process module (*e.g.*, GUI-based Application software), a front call control process module (*e.g.*, user equipment (UE)) and a hardware subsystem (*e.g.*, Hardware) for performing a call test (*e.g.*, call tests for cellular networks 2G, 3G, 4G and 5G). The back process module (*e.g.*, Application software) provides an operation interface for a user to perform a call test setup (setting various parameters for call test), receives call test result data (*e.g.*, result report) transmitted by the front call control process module (*e.g.*, user equipment (UE)), and displays the result on the display of the Accused Instrumentality. The front call control process module receives call test setup parameters provided by the Application software, controls the hardware subsystem (Hardware Units in the Accused Instrumentality) to perform a call test, and reports a result of the call test to Noffz Application software. The hardware subsystem comprises function process units of the switch to receive instructions from the user equipment (UE), perform tests comprising starting a call, hanging-up a call and handover between calls; and report test results to the front call control process module.





## Base Station Emulator sUTP 5018

FOR CUSTOM CELLULAR NETWORKS



### APPLICATION FIELD

Primarily used for multi-DUT product validation of cellular devices like automotive telematic control units or smartphones. Suitable for comprehensive parallel testing of up to 32 phone modules from simple go/no-go check to 3600 hours life-cycle analysis. Equipped for dual-cell SISO, 2x2 MIMO or single-cell 4x4 MIMO operation to conduct tests like: Voice call, text messaging, eCall, maximum data throughput or mobile hotspot sharing. Reproduce a specific cellular environment, generate traffic, monitor and log connection parameters with the UTP BSE Manager Software.

(E.g., <https://noffz.com/wp-content/uploads/2021/04/14635-produktblatt-sutp-5018-bse.pdf>).

## TECHNICAL DATA

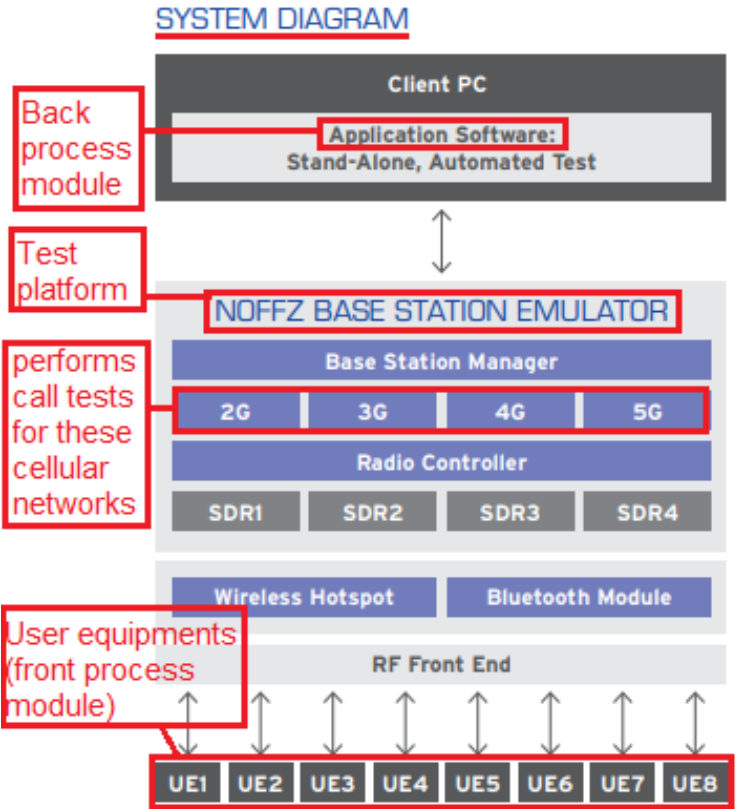
**sUTP 5018 BSE****Mechanics**

<b>Housing</b>	450 x 318 x 495 mm (W x H x D) / 7U
<b>Weight</b>	20 kg

**Cellular Networks**

<b>5G NR</b>	NR Rel-15 compliant Non-Standalone support (NSA) Standalone support (SA) 5-100 MHz support FR1 (sub-6GHz) SISO, 2 x 2 MIMO (NSA and SA) 4 x 4 MIMO (only SA) Carrier aggregation 3 x CC 256-QAM
<b>LTE</b>	LTE Rel-14 compliant SISO dual band 2 x 2 MIMO dual band 4 x 4 MIMO single band Carrier aggregation 5 x CC VoIP support Handover support
<b>GSM</b>	GSM 850, GSM 900, DCS 1800 and PCS 1900 2 x simultaneous ARFCNs Handover support Emergency Call support GPRS/EDGE
<b>UMTS</b>	Band 1, 4, 5, 8, 19 1x UARFCN

(E.g., <https://noffz.com/wp-content/uploads/2021/04/14635-produktblatt-sutp-5018-bse.pdf>).



(E.g., <https://noffz.com/wp-content/uploads/2021/04/14635-produktblatt-sutp-5018-bse.pdf> ).

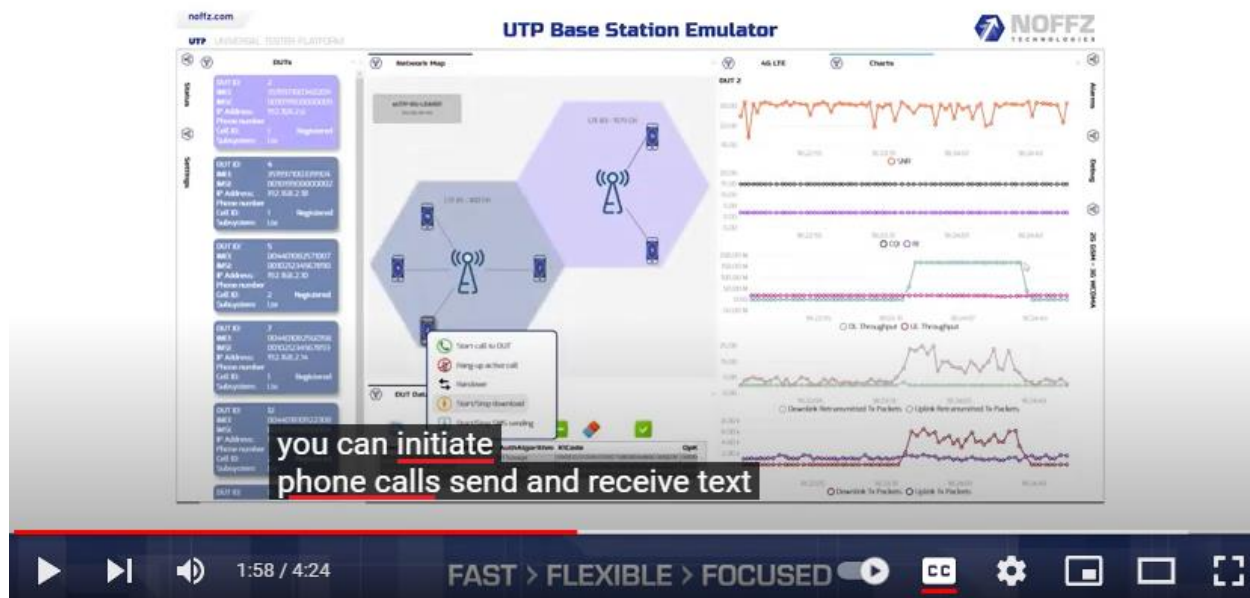




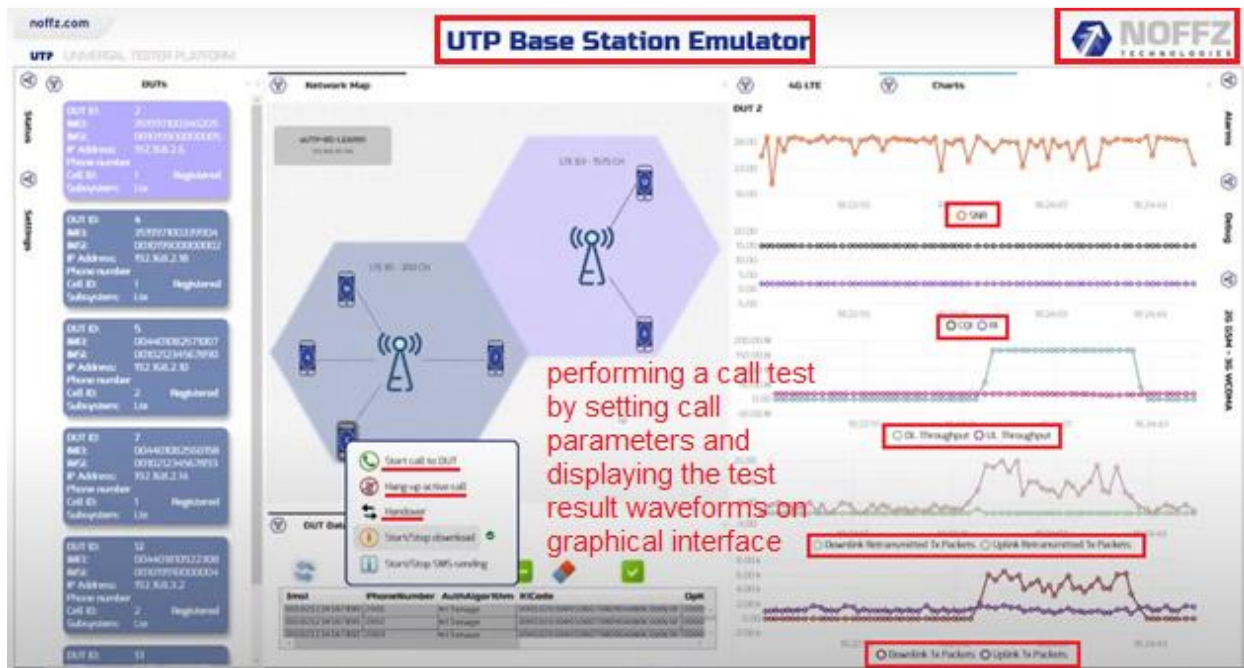
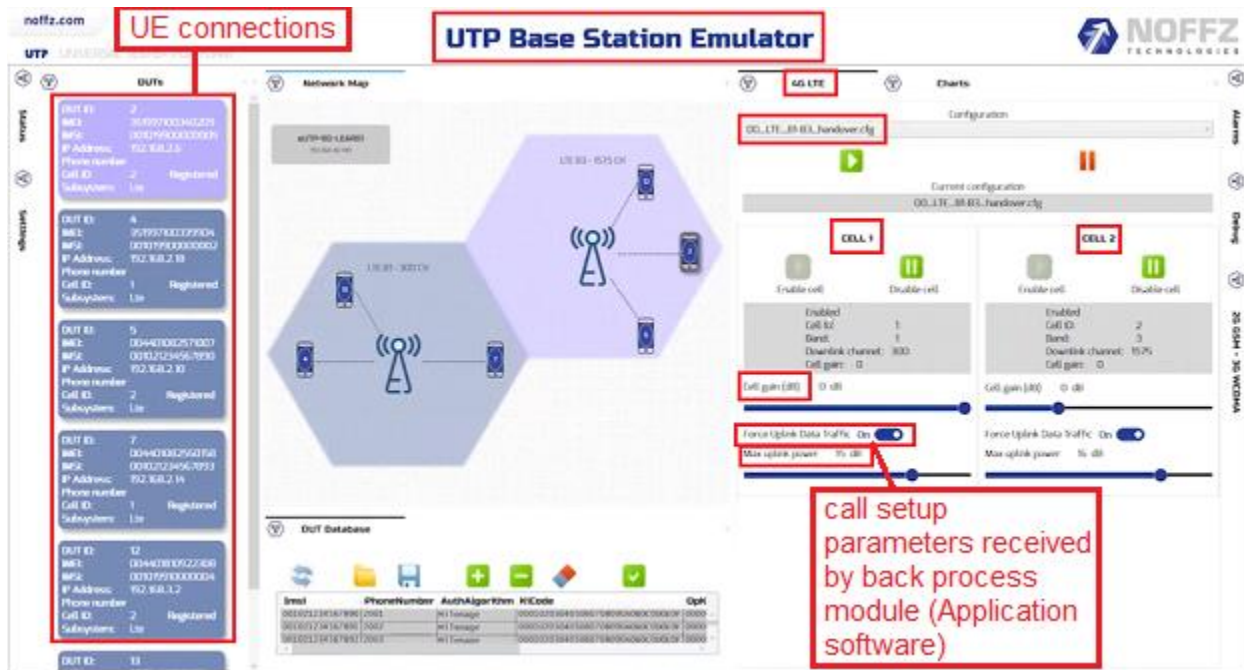
(E.g., <https://www.youtube.com/watch?v=x5Pp1UzADIE>).



## 2G to 5G Multi-DUT Functional Test with One Cellular Network Emulator - NOFFZ BSE sUTP 5018

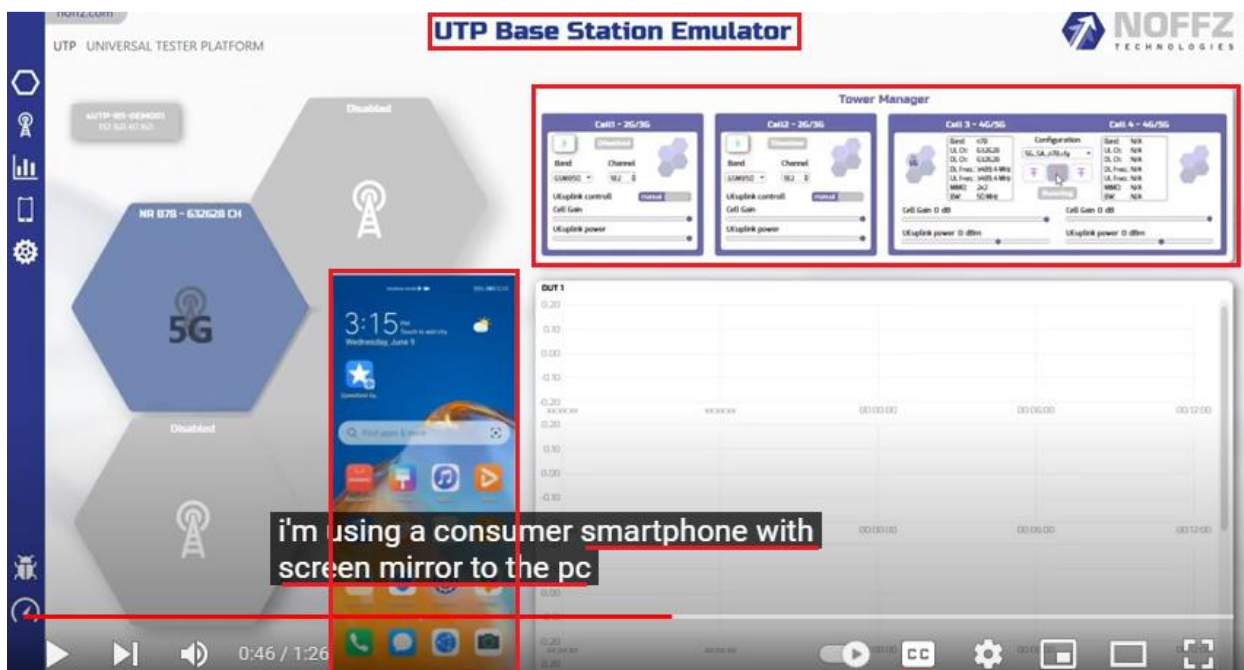
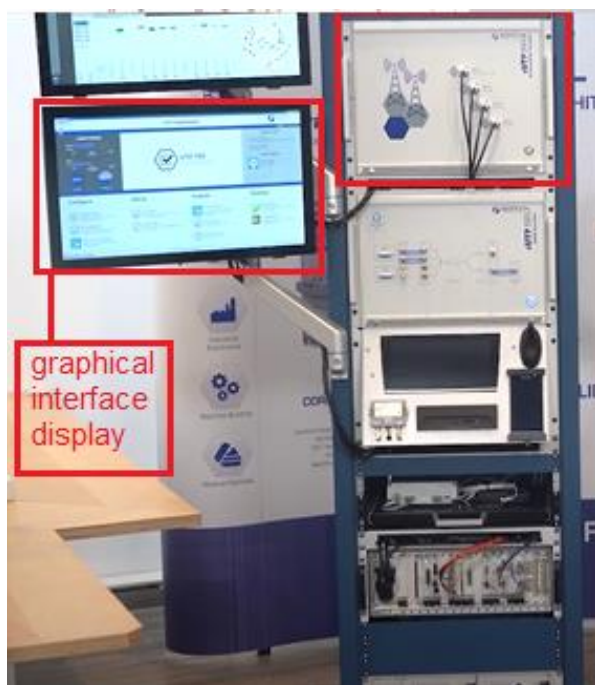


(E.g., <https://www.youtube.com/watch?v=x5Pp1UzADIE>).

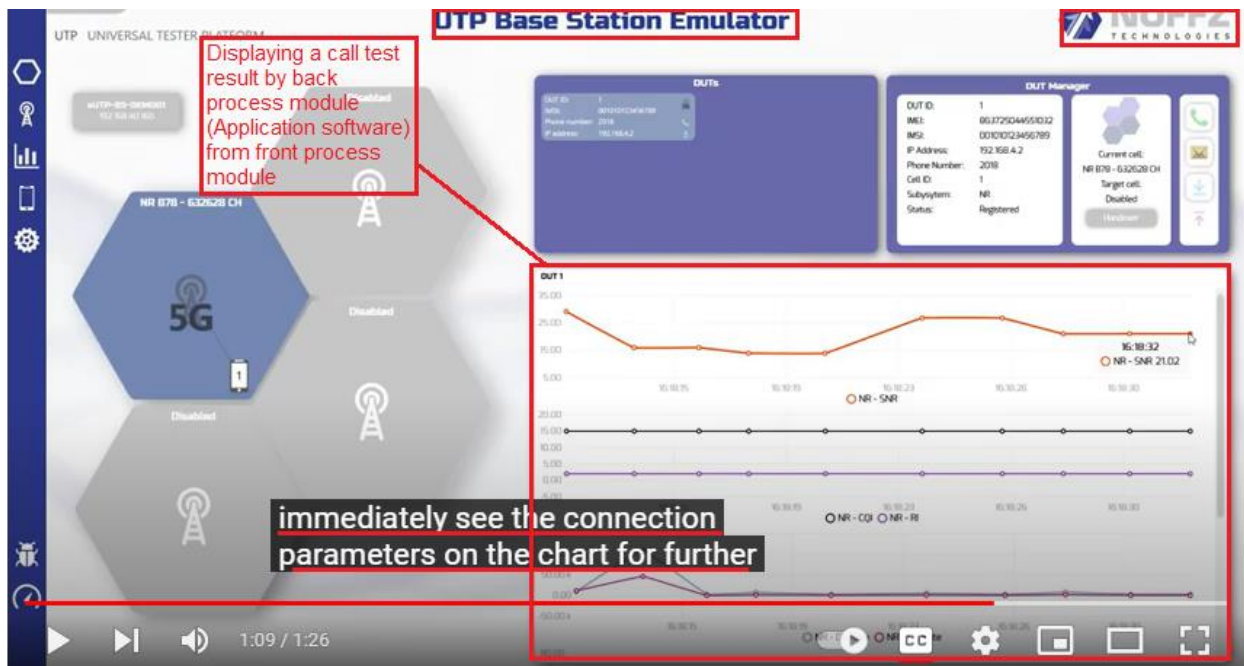


(E.g., <https://www.youtube.com/watch?v=x5Pp1UzADIE>).





(E.g., <https://www.youtube.com/watch?v=x5Pp1UzADIE>).



(E.g., <https://www.youtube.com/watch?v=x5Pp1UzADIE>).

18. The Accused Instrumentality is a simulated user call test system that comprises the front call control process module (e.g., user equipment (UE)) is included in a main control module of the switch (e.g., the Accused Instrumentality) to receive call test setup parameters (e.g., call test data containing various parameters, such as SNR, Bandwidth, etc.) provided by the back process module (e.g., GUI-based Application software), control the hardware subsystem (e.g., Hardware) to perform a call test process (e.g., 2G/3G/4G/5G call test) according to a flowchart and user parameters set (e.g. Various parameters, such as SNR, Bandwidth, etc.), and report a result of the call test to the back process module (e.g., GUI-based Application software). As shown below, the Accused Instrumentality is a part of the simulated user call test system which is a GUI-based Application software with the UTP Base Station Emulator. The Accused Instrumentality comprises back process module (e.g., GUI-based Application software), a front call control process module (e.g., user equipment (UE)) and a hardware subsystem (e.g., Hardware) for performing a call test (e.g., call tests for cellular networks 2G, 3G, 4G and 5G). The back process

module (*e.g.*, Application software) provides an operation interface for a user to perform a call test setup (setting various parameters for call test), receives call test result data (*e.g.*, result analysis) transmitted by the front call control process module (*e.g.*, user equipment (UE)), and displays the result on the display of the Accused Instrumentality. The front call control process module receives call test setup parameters provided by the Application software, controls the hardware subsystem (Hardware Units in the Accused Instrumentality) to perform a call test, and reports a result of the call test to Noffz Application software. The hardware subsystem comprises function process units of the switch to receive instructions from the user equipment (UE), perform tests comprising starting a call, hanging-up a call and handover between calls; and report test results to the front call control process module.



## Base Station Emulator sUTP 5018

FOR CUSTOM CELLULAR NETWORKS



### APPLICATION FIELD

Primarily used for multi-DUT product validation of cellular devices like automotive telematic control units or smartphones. Suitable for comprehensive parallel testing of up to 32 phone modules from simple go/no-go check to 3600 hours life-cycle analysis. Equipped for dual-cell SISO, 2x2 MIMO or single-cell 4x4 MIMO operation to conduct tests like: Voice call, text messaging, eCall, maximum data throughput or mobile hotspot sharing. Reproduce a specific cellular environment, generate traffic, monitor and log connection parameters with the UTP BSE Manager Software.

(E.g., <https://noffz.com/wp-content/uploads/2021/04/14635-produktblatt-sutp-5018-bse.pdf>).



## TECHNICAL DATA

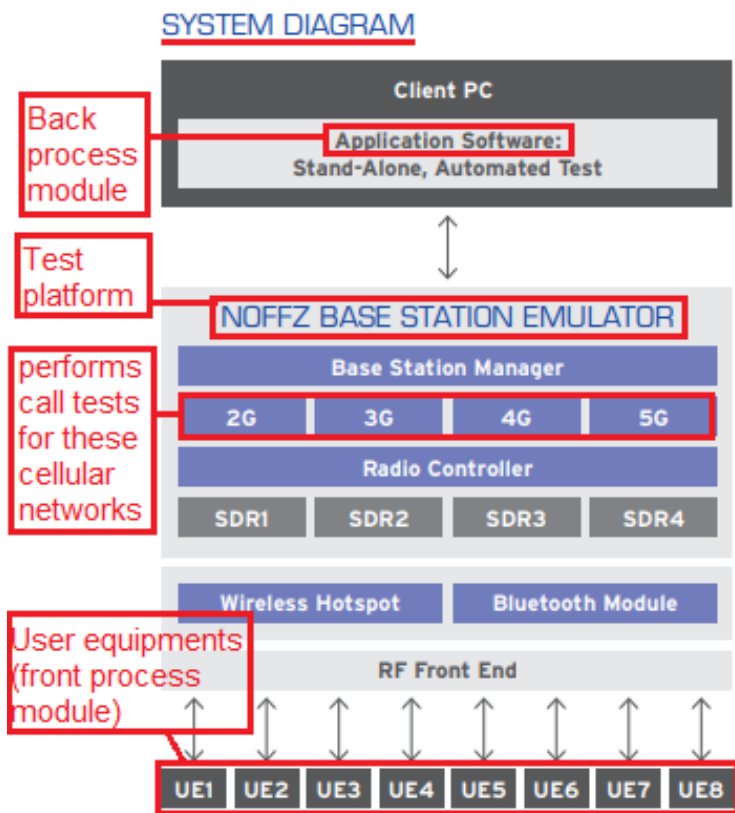
**sUTP 5018 BSE****Mechanics**

<b>Housing</b>	450 x 318 x 495 mm (W x H x D) / 7U
<b>Weight</b>	20 kg

**Cellular Networks**

<b>5G NR</b>	NR Rel-15 compliant Non-Standalone support (NSA) Standalone support (SA) 5-100 MHz support FR1 (sub-6GHz) SISO, 2 x 2 MIMO (NSA and SA) 4 x 4 MIMO (only SA) Carrier aggregation 3 x CC 256-QAM
<b>LTE</b>	LTE Rel-14 compliant SISO dual band 2 x 2 MIMO dual band 4 x 4 MIMO single band Carrier aggregation 5 x CC VoIP support Handover support
<b>GSM</b>	GSM 850, GSM 900, DCS 1800 and PCS 1900 2 x simultaneous ARFCNs Handover support Emergency Call support GPRS/EDGE
<b>UMTS</b>	Band 1, 4, 5, 8, 19 1x UARFCN

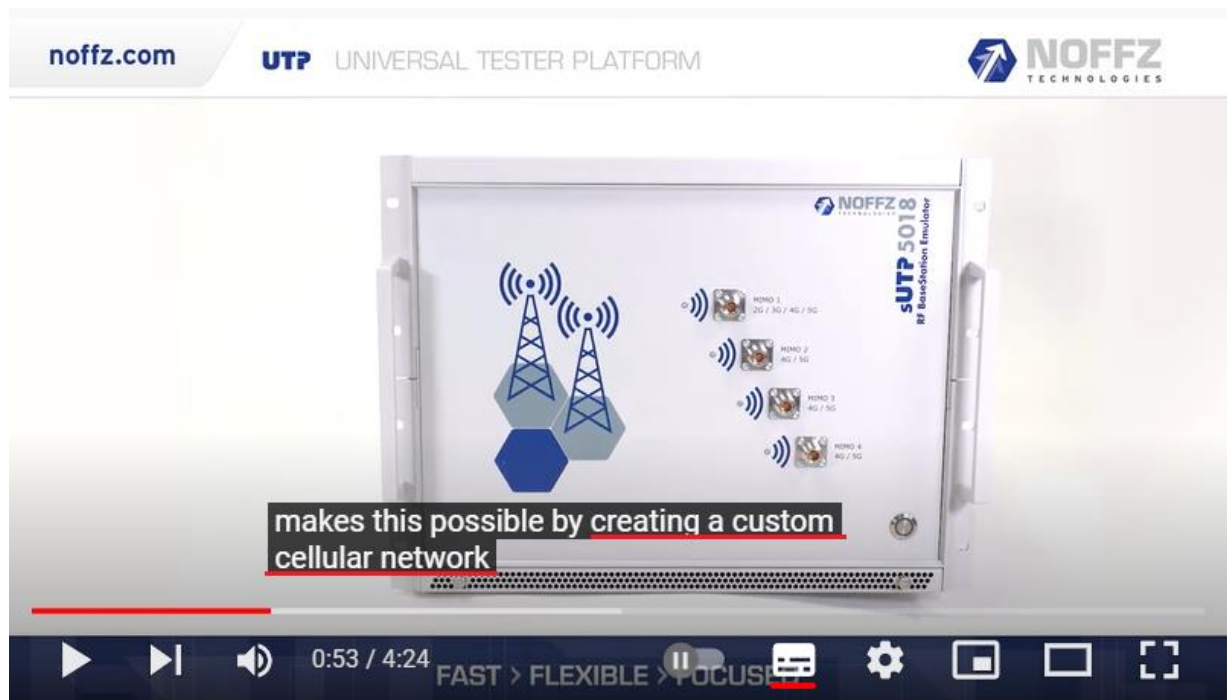
(E.g., <https://noffz.com/wp-content/uploads/2021/04/14635-produktblatt-sutp-5018-bse.pdf>).



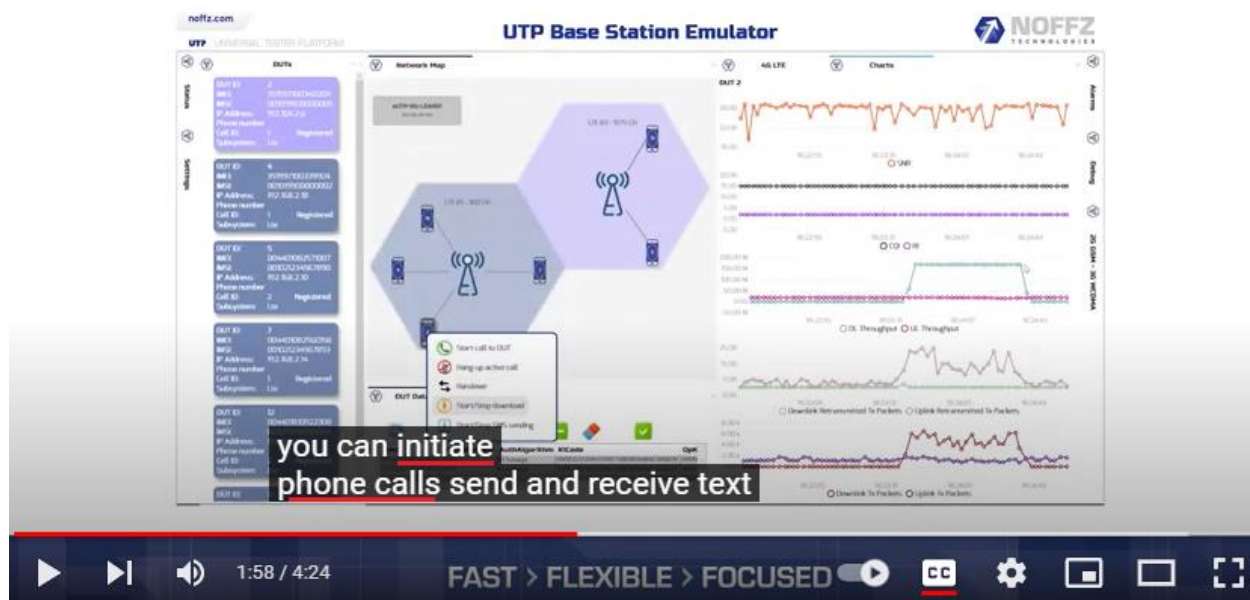
(E.g., <https://noffz.com/wp-content/uploads/2021/04/14635-produktblatt-sutp-5018-bse.pdf> ).



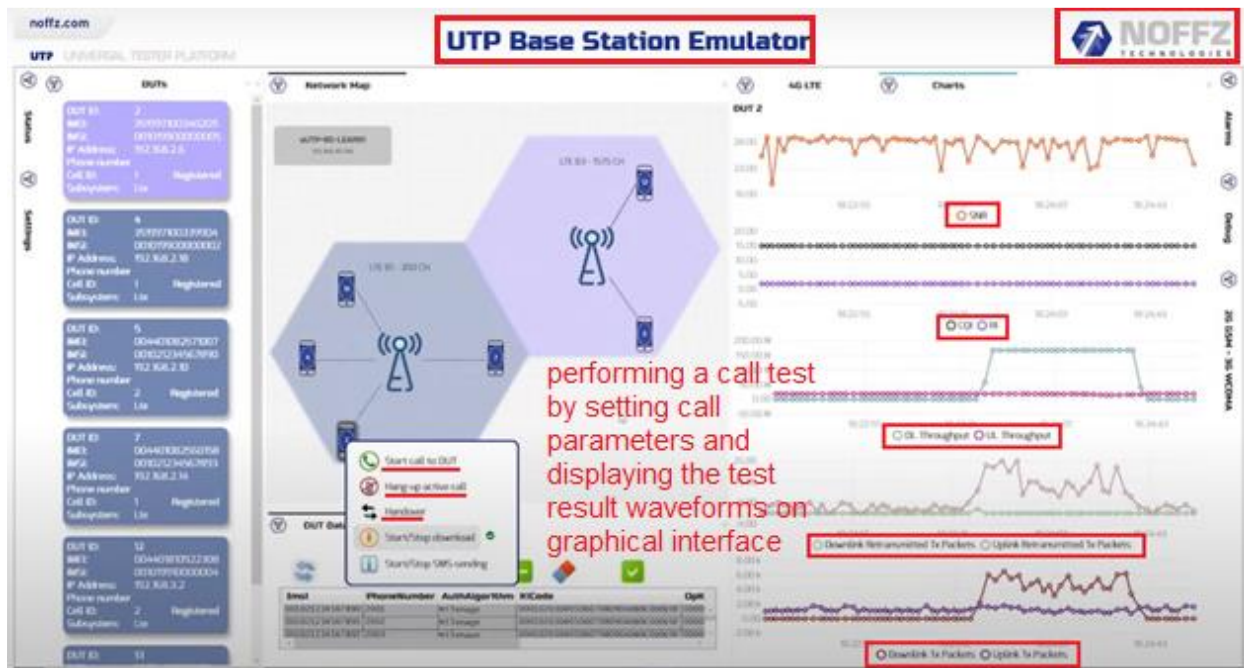
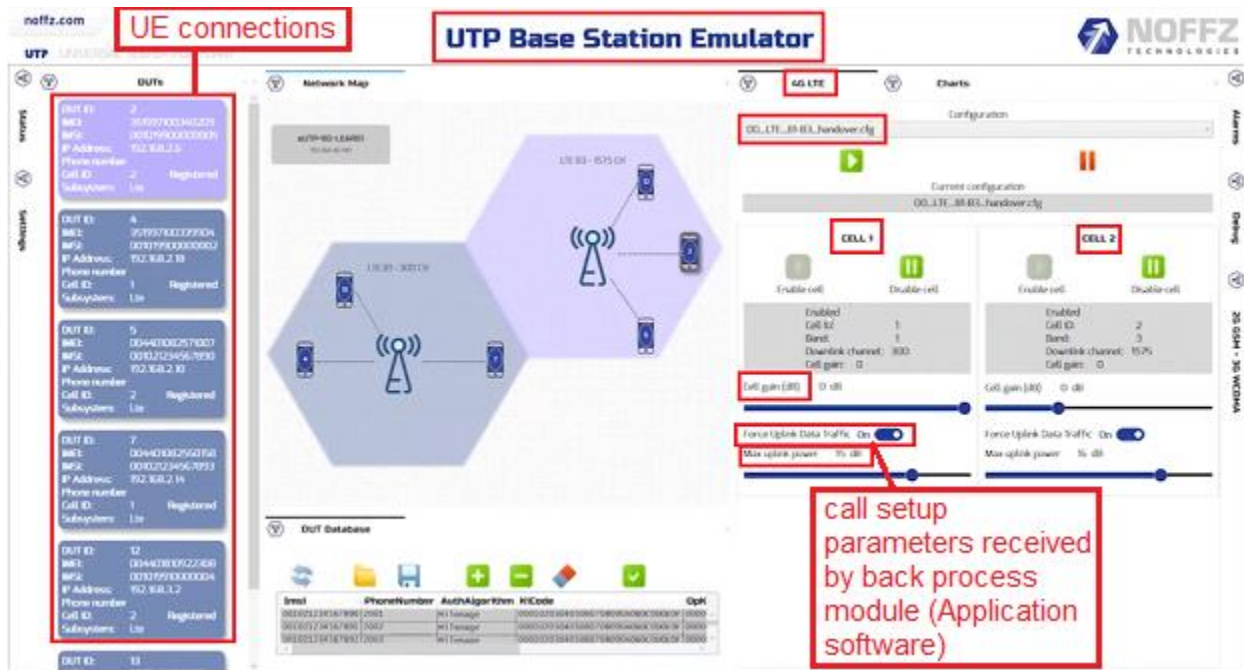
(E.g., <https://www.youtube.com/watch?v=x5Pp1UzADIE>).



## 2G to 5G Multi-DUT Functional Test with One Cellular Network Emulator - NOFFZ BSE sUTP 5018

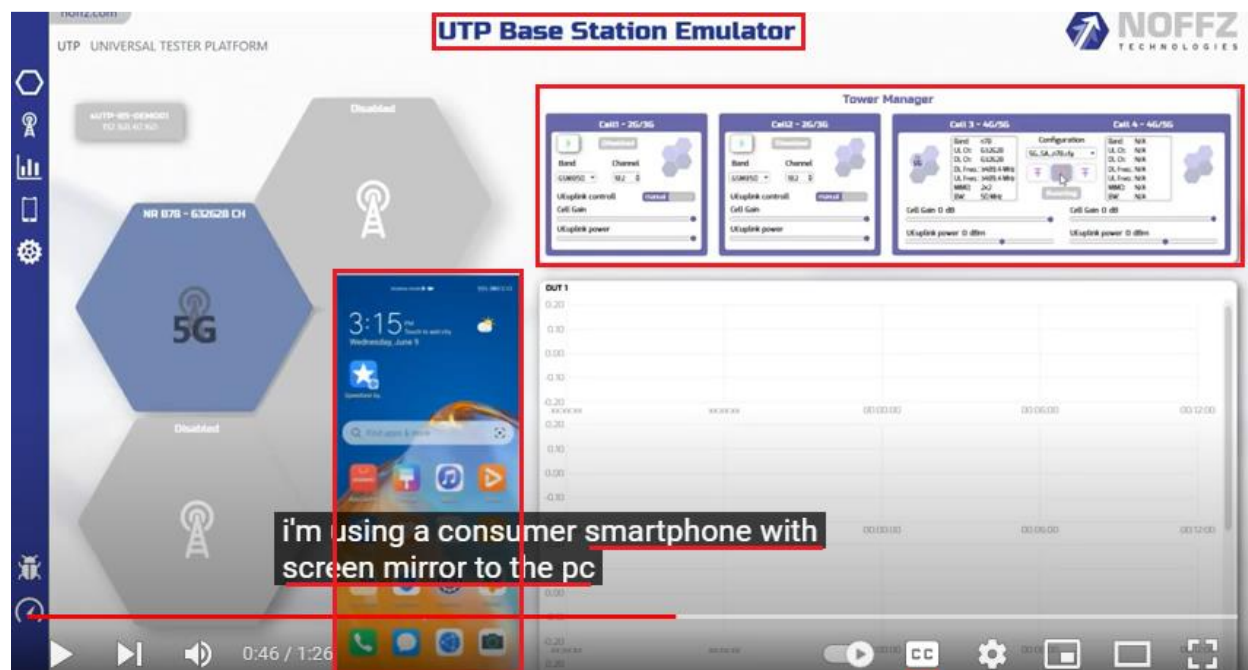
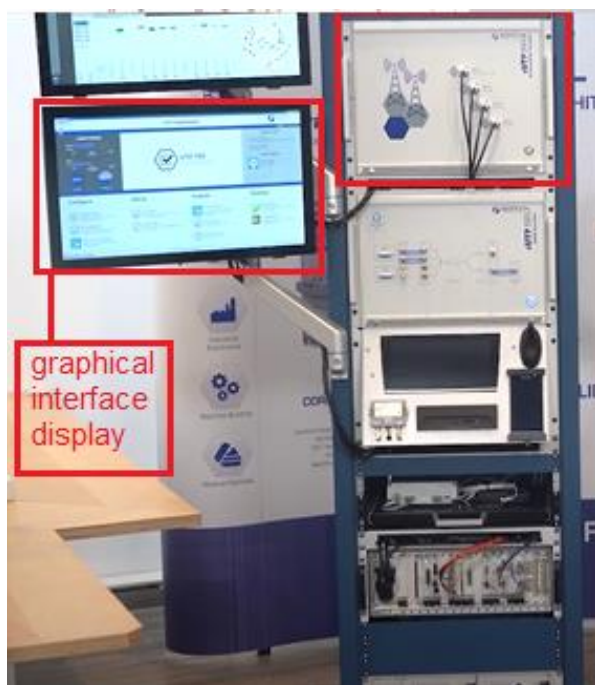


(E.g., <https://www.youtube.com/watch?v=x5Pp1UzADIE>).

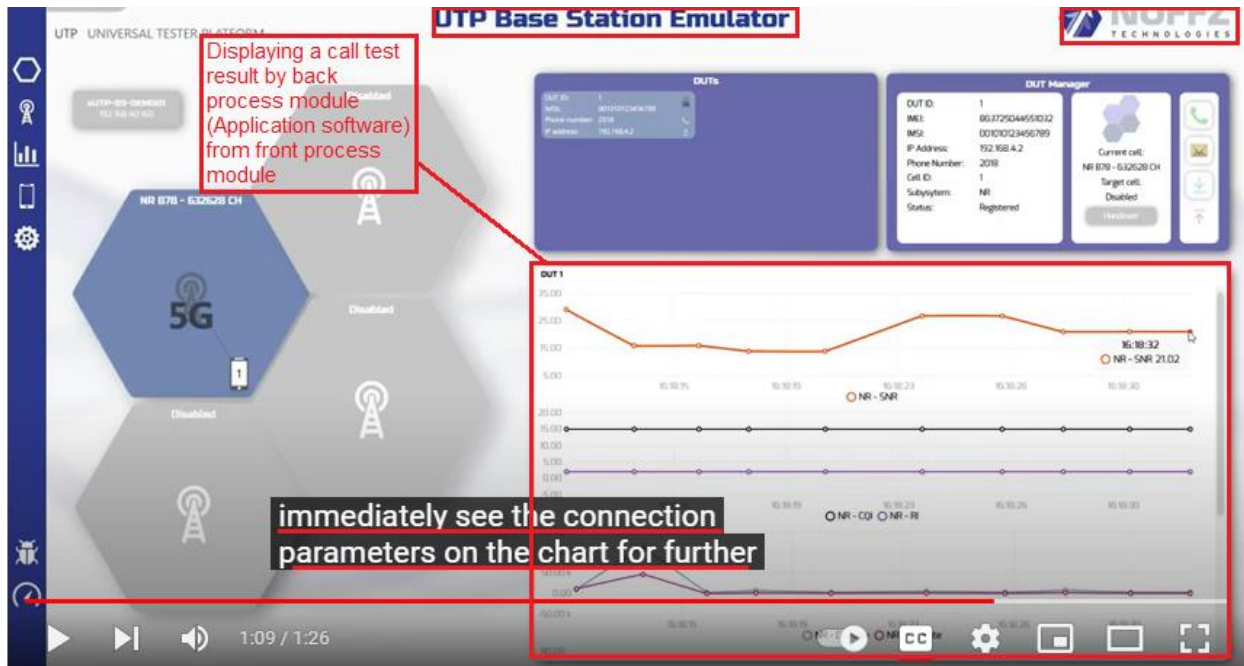


(E.g., <https://www.youtube.com/watch?v=x5Pp1UzADIE>).





(E.g., <https://www.youtube.com/watch?v=x5Pp1UzADIE>).



(E.g., <https://www.youtube.com/watch?v=x5Pp1UzADIE>).

19. The Accused Instrumentality is a simulated user call test system that comprises a hardware subsystem (e.g., Hardware) that comprises function process units of the digital stored program control switch (e.g., the Accused Instrumentality) to receive instructions from the front call control process module (e.g., user equipment (UE)), perform tests comprising at least one of the following: picking-up or hanging-up phones, detecting signaling tone, dialing, sending a test tone, or talking (see the below evidence of use showing starting a call, hanging-up a call, etc.) and report test results to the front call control process module (e.g., user equipment (UE)), and wherein the hardware subsystem further comprises a loop relay panel (e.g., display interface connected to UTP Base Station Emulator) used for simulating picking-up or hanging-on a phone in a calling (e.g., initiating a call, call hanging) or called user terminal and dial function of dial pulse form by the calling user. As shown below, the Accused Instrumentality is a part of the simulated user call test system which is a GUI-based Application software with the UTP Base Station Emulator. The Accused Instrumentality comprises back process module (e.g., GUI-based Application software),



a front call control process module (*e.g.*, user equipment (UE)) and a hardware subsystem (*e.g.*, Hardware) for performing a call test (*e.g.*, call tests for cellular networks 2G, 3G, 4G and 5G). The back process module (*e.g.*, Application software) provides an operation interface for a user to perform a call test setup (setting various parameters for call test), receives call test result data (*e.g.*, result analysis) transmitted by the front call control process module (*e.g.*, user equipment (UE)), and displays the result on the display of the Accused Instrumentality. The front call control process module receives call test setup parameters provided by the Application software, controls the hardware subsystem (Hardware Units in the Accused Instrumentality) to perform a call test, and reports a result of the call test to Noffz Application software. The hardware subsystem comprises function process units of the switch to receive instructions from the user equipment (UE), perform tests comprising starting a call, hanging-up a call and handover between calls; and report test results (*e.g.*, report generator) to the front call control process module.



## Base Station Emulator sUTP 5018

FOR CUSTOM CELLULAR NETWORKS



### APPLICATION FIELD

Primarily used for multi-DUT product validation of cellular devices like automotive telematic control units or smartphones. Suitable for comprehensive parallel testing of up to 32 phone modules from simple go/no-go check to 3600 hours life-cycle analysis. Equipped for dual-cell SISO, 2x2 MIMO or single-cell 4x4 MIMO operation to conduct tests like: Voice call, text messaging, eCall, maximum data throughput or mobile hotspot sharing. Reproduce a specific cellular environment, generate traffic, monitor and log connection parameters with the UTP BSE Manager Software.

(E.g., <https://noffz.com/wp-content/uploads/2021/04/14635-produktblatt-sutp-5018-bse.pdf>).

## TECHNICAL DATA

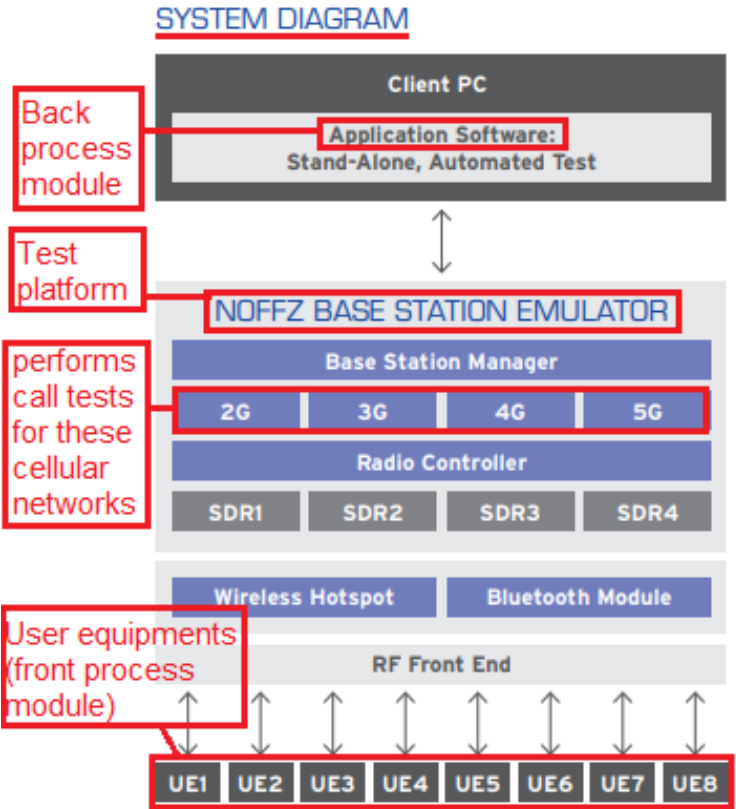
**sUTP 5018 BSE****Mechanics**

<b>Housing</b>	450 x 318 x 495 mm (W x H x D) / 7U
<b>Weight</b>	20 kg

**Cellular Networks**

<b>5G NR</b>	NR Rel-15 compliant Non-Standalone support (NSA) Standalone support (SA) 5-100 MHz support FR1 (sub-6GHz) SISO, 2 x 2 MIMO (NSA and SA) 4 x 4 MIMO (only SA) Carrier aggregation 3 x CC 256-QAM
<b>LTE</b>	LTE Rel-14 compliant SISO dual band 2 x 2 MIMO dual band 4 x 4 MIMO single band Carrier aggregation 5 x CC VoIP support Handover support
<b>GSM</b>	GSM 850, GSM 900, DCS 1800 and PCS 1900 2 x simultaneous ARFCNs Handover support Emergency Call support GPRS/EDGE
<b>UMTS</b>	Band 1, 4, 5, 8, 19 1x UARFCN

(E.g., <https://noffz.com/wp-content/uploads/2021/04/14635-produktblatt-sutp-5018-bse.pdf>).



(E.g., <https://noffz.com/wp-content/uploads/2021/04/14635-produktblatt-sutp-5018-bse.pdf> ).

noffz.com UTP UNIVERSAL TESTER PLATFORM NOFFZ TECHNOLOGIES



take a closer look  
validating cellular devices

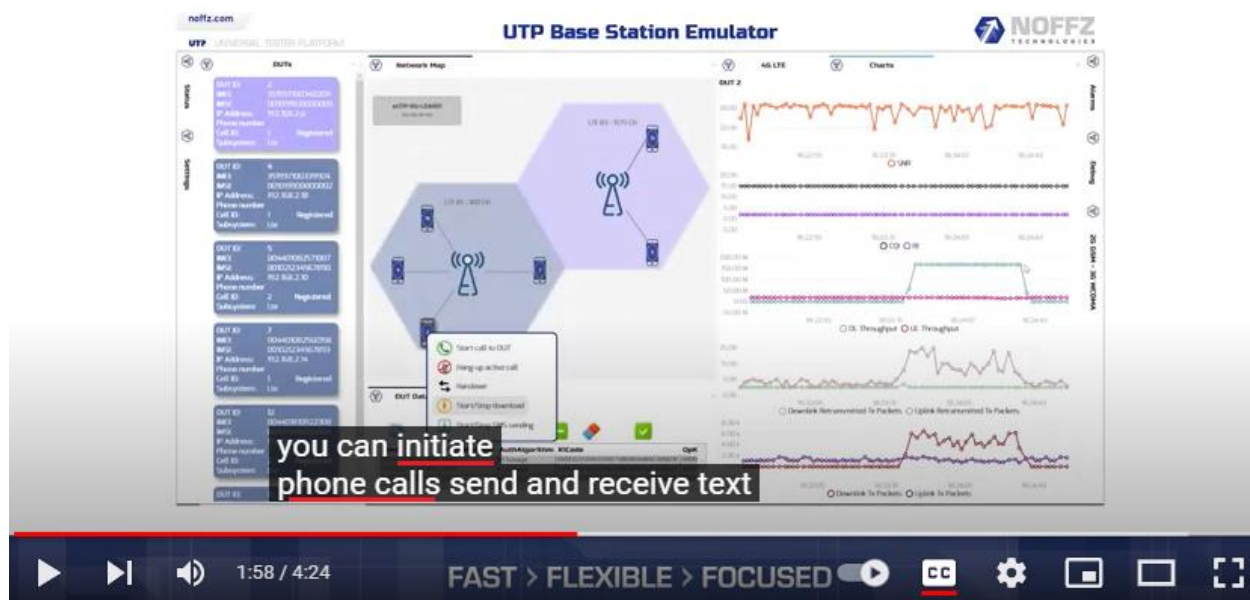
0:32 / 4:24 FAST > FLEXIBLE > FOCUS

2G to 5G Multi-DUT Functional Test with One Cellular Network Emulator - NOFFZ BSE sUTP 5018

(E.g., <https://www.youtube.com/watch?v=x5Pp1UzADIE>).

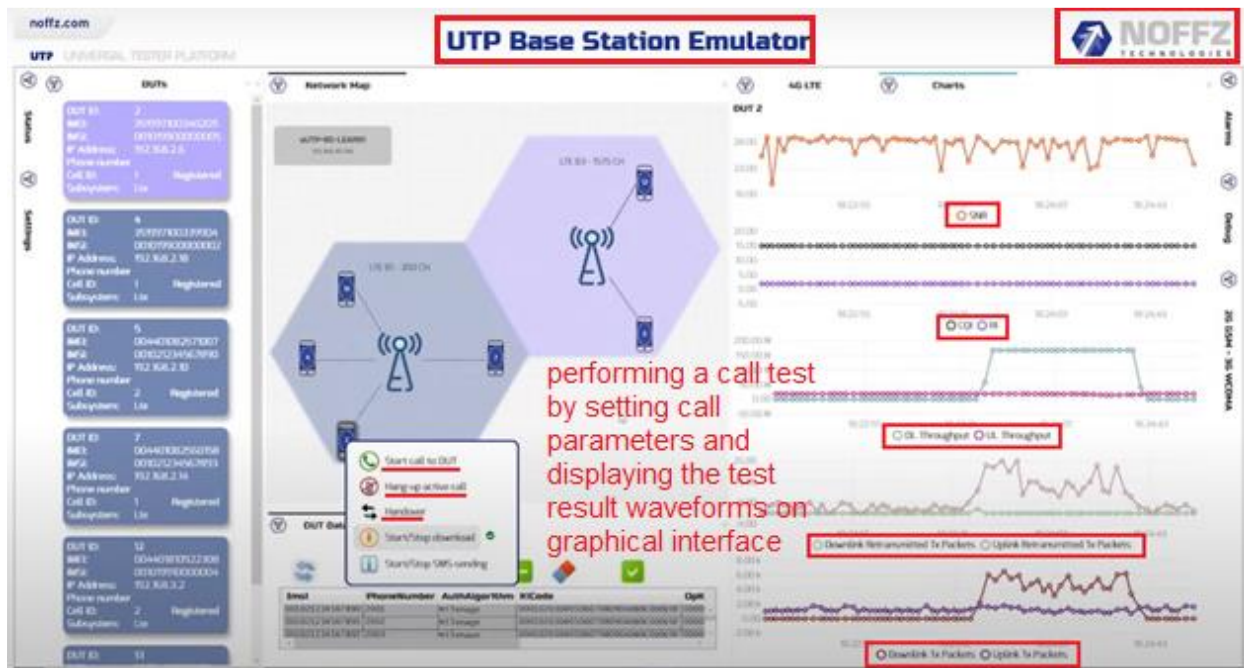
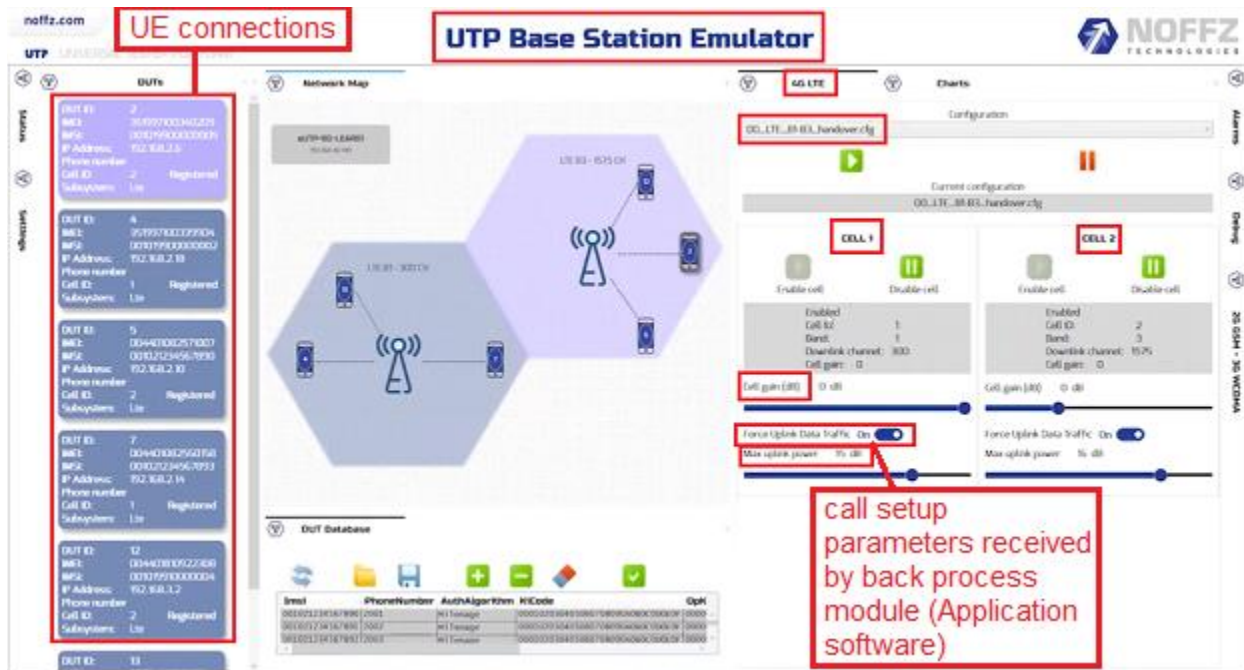


## 2G to 5G Multi-DUT Functional Test with One Cellular Network Emulator - NOFFZ BSE sUTP 5018



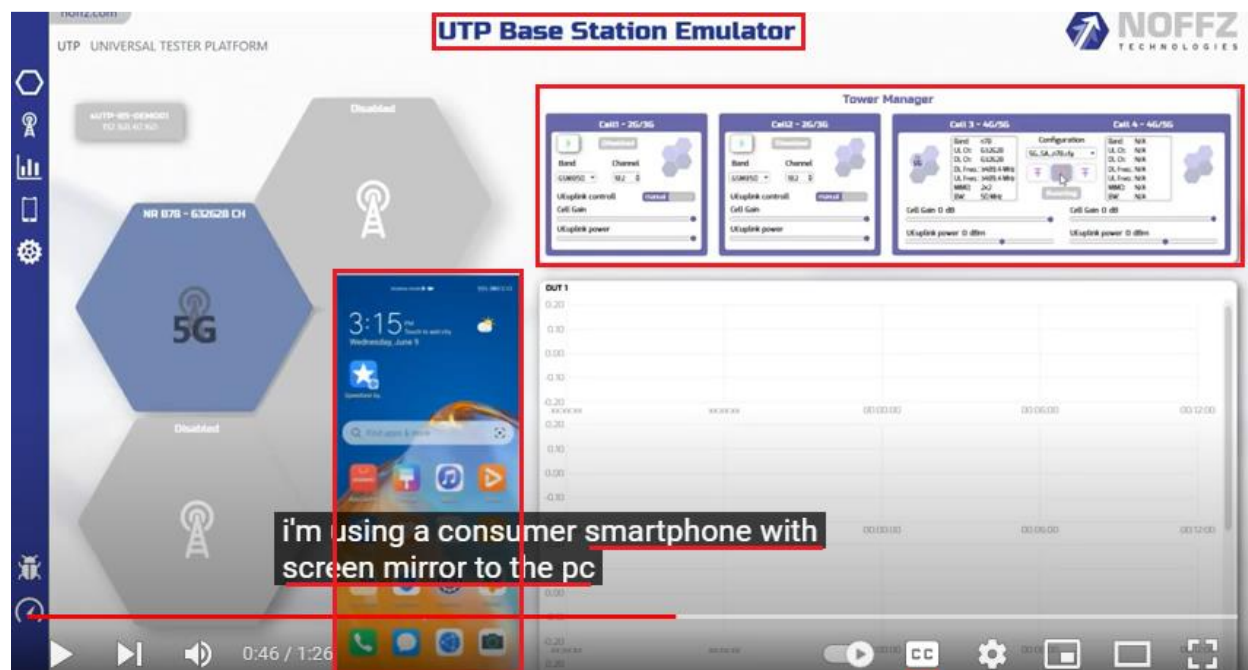
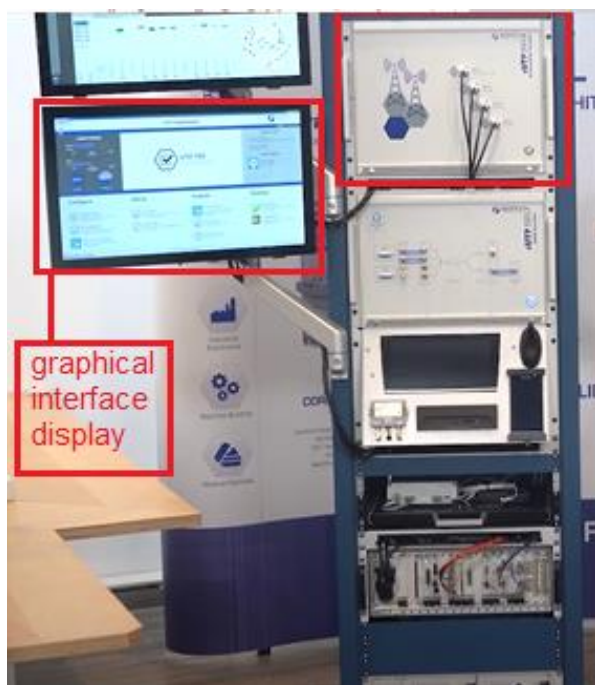
(E.g., <https://www.youtube.com/watch?v=x5Pp1UzADIE>).



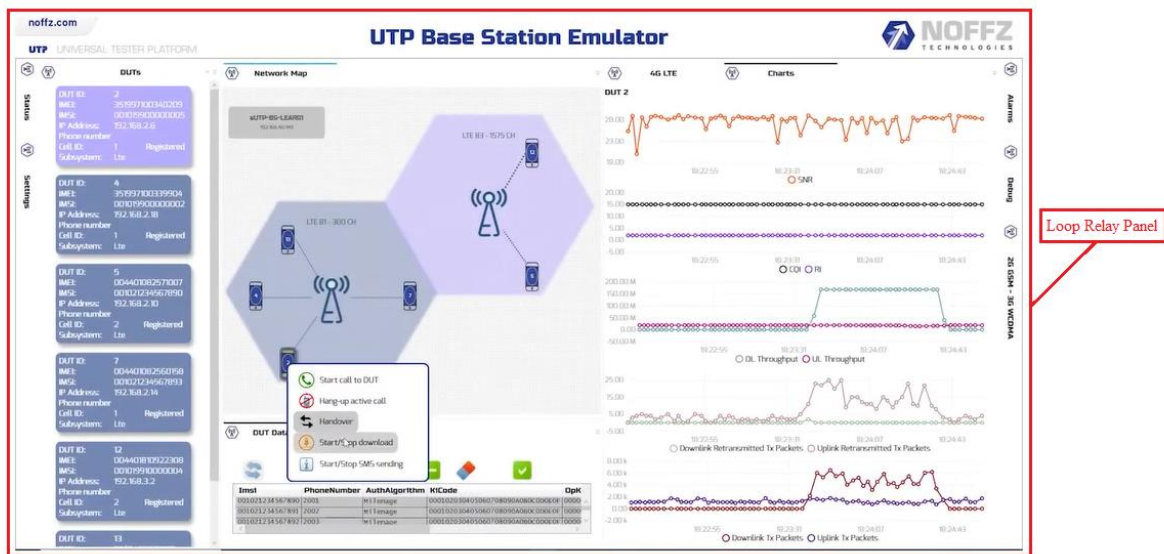
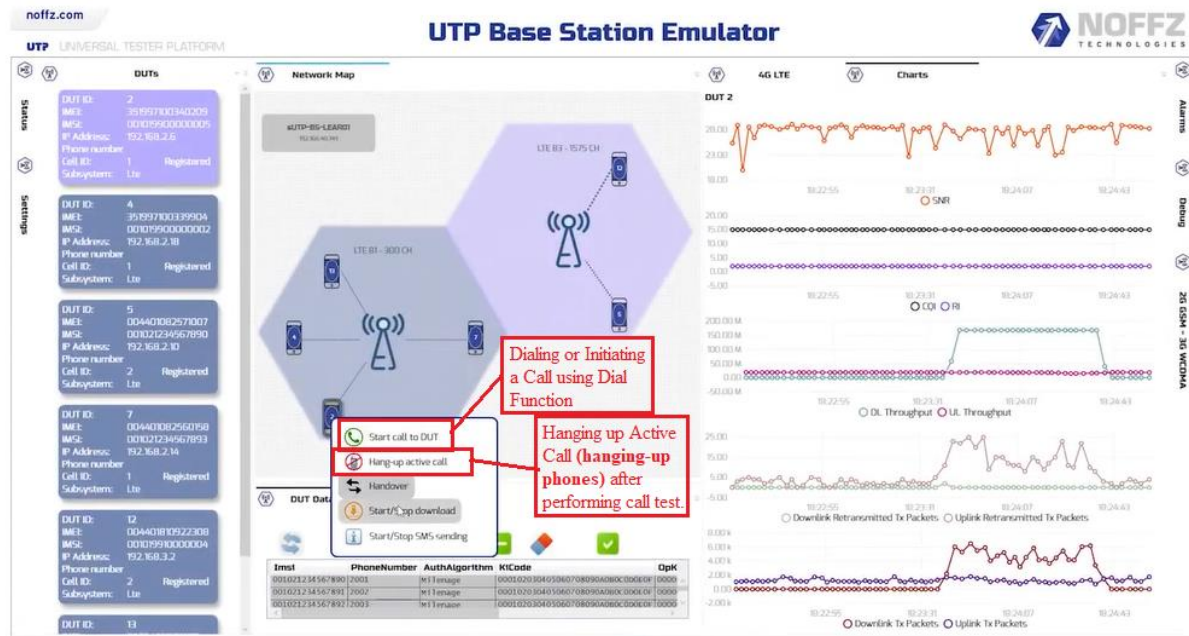


(E.g., <https://www.youtube.com/watch?v=x5Pp1UzADIE>).

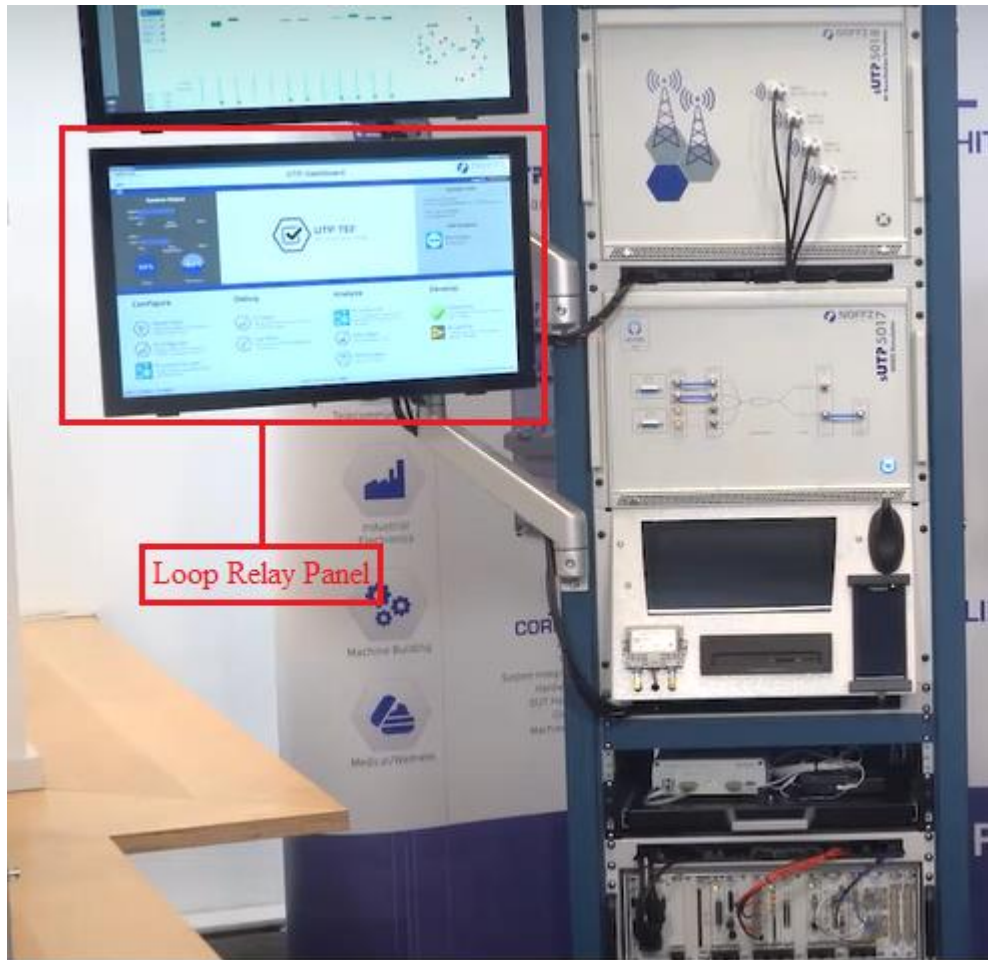




(E.g., <https://www.youtube.com/watch?v=x5Pp1UzADIE>).



(E.g., <https://www.youtube.com/watch?v=x5Pp1UzADIE>).



(E.g., <https://www.youtube.com/watch?v=x5Pp1UzADIE>).

20. Plaintiff has been damaged as a result of Defendant's infringing conduct with respect to United States Patent Nos. 7,668,301. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '301 patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

21. On information and belief, and to the extent required, all marking requirements have been complied with.

**V. JURY DEMAND**

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

**VI. PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests that the Court find in its favor and against Defendant, and that the Court grant Plaintiff the following relief:

- a. Judgment that one or more claims of United States Patent Nos. 7,668,301 has been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- b. Judgment that Defendant account for and pay to Plaintiff all damages to and costs incurred by Plaintiff because of Defendant's infringing activities and other conduct complained of herein, and an accounting of all infringements and damages not presented at trial;
- c. That Plaintiff be granted pre-judgment and post-judgment interest on the damages caused by Defendant's infringing activities and other conduct complained of herein; and
- d. That Plaintiff be granted such other and further relief as the Court may deem just and proper under the circumstances.

July 26, 2022

Respectfully Submitted,

/s/ David R. Bennett

David R. Bennett

*(Admitted to the U.S. Dist. Ct. for the W.D. Texas)*

Direction IP Law

P.O. Box 14184

Chicago, IL 60614-0184

(312) 291-1667

dbennett@directionip.com

*Attorneys for Plaintiff Prestwick Licensing LLC*